

UNITED STATES DISTRICT COURT

for the

Western District of Tennessee

United States of America

v.

Katrina Robinson, Katie Ayers, Brooke Boudreaux

Case No. 21-cr-20003-MSN/tmp

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of Oct. 1-Nov. 27, 2017 in the county of Shelby in the
Western District of Tennessee, the defendant(s) violated:

Code Section

Offense Description

18 U.S.C. § 1349

Conspiracy to Commit Wire Fraud

18 U.S.C. § 1956(h)

Conspiracy to Commit Money Laundering

This criminal complaint is based on these facts:

See attached affidavit.

☒ Continued on the attached sheet.


Complainant's signature

Brent A. Hayden, Special Agent, FBI

Printed name and title

Sworn to before me via telephone.

Date: January 14, 2021

s/Tu M. Pham

Judge's signature

City and state: Memphis, Tennessee

Tu M. Pham, U.S. Magistrate Judge

Printed name and title